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Attorneys for Defendants FLOORINDO, INC. dba TROPICAL FLOORING, MAXIMUS FLOORING, FANTASTIC FLOORING, POPULAR FLOORING, KC INDUSTRIES CO., CHRISTINA & SON, INC., GUNTAR SALIM, TEGUH SALIM, TOUPAN SALIM, BOBBY LIN aka BOBBY LIM, YUN FANG ZHANG aka CHRISTINA ZHANG

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNILIN BEHEER B.V., *et al.* Plaintiffs, v. TROPICAL FLOORING, *et al.* Defendants.	Case No.: 2:14-cv-02209-BRO(SSx) **DEFENDANTS' NOTICE OF MOTION AND MOTION TO DISMISS PLAINTIFFS' COMPLAINT** Date: June 16, 2014 Time: 1:30 P.M. Place: Courtroom 14 Judge: Hon. Beverly Reid O'Connell

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT, on June 16, 2014 or as soon thereafter as the matter may be heard in Courtroom 14 of the above entitled court, located at 312 North Spring Street, Los Angeles, California, Defendants Floorindo, Inc. dba Tropical Flooring, Maximus Flooring, Fantastic Flooring, Popular Flooring, and the individuals Guntar Salim, Teguh Salim, Toupan Salim, Bobby Lin aka Bobby Lim (collectively "Floorindo"), and KC Industries Co., Christina & Son, Inc., and the individual Yun Fang Zhang aka Christina Zhang (collectively "KC"), will, and hereby do, move this Court for an order dismissing the Complaint filed by Unilin Beheer B.V., and Flooring Industries, Ltd. Sarl (collectively "Unilin") pursuant to 12(b)(6) of the Federal Rules of Civil Procedure and applicable case law. This motion is made following the conference of counsel pursuant to Local Rule 7-3 which took place on May 9, 2014.

This Motion is made on the grounds that the Complaint fails to allege facts establishing plausible claims for direct and indirect infringement of the patents-in-suit pursuant to 35 U.S.C. § 271(a), (b), and (c). As a result, Floorindo and KC has not been provided fair notice as required by Rule 8 of the Federal Rules of Civil Procedure of their alleged infringement of those patents.

In support of this Motion, Floorindo and KC hereby incorporate the accompanying Memorandum of Points and Authorities, the Declaration of Bobby Lin aka Bobby Lim, the Declaration of Christina Zhang aka Yun Fang Zhang, the Declaration of Vivian Z. Wang and any other argument or authority that may be presented at the hearing on this motion.

Respectfully submitted,

Dated: May 16, 2014 By: */s/ Vivian Z. Wang*
Michael Hurey
Vivian Z. Wang

Attorneys for Defendants

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury that I am over the age of 18 years and not a party to this action; and that I served the individuals on the below-service list the following document(s):

DEFENDANTS' NOTICE OF MOTION AND MOTION TO DISMISS PLAINTIFFS' COMPLAINT

Filed May 16, 2014 on the ECF system, served pursuant to General Order No. 550 and/or via email, with:

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Aijun Zhang aijunzhang@verizon.net LAW OFFICES OF AIJUN ZHANG	Attorneys for Defendants Andrew Oei, Nulook Floor,Inc., and Siena Décor, Inc.

Date: May 16, 2014

/s/*Vivian Z. Wang*
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